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November 13, 1991

Randy Sturgeon
Remedial Project Manager
DE/MD Section
United States Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

Dear Mr. Sturgeon,

Attached is a letter from Versar addressing Stephen Johnson's October 22, 1991 letter to me. I apologize for inadvertently not sending you a copy. If I may be of further assistance please contact me at (302) 734-6787.

Sincerely,

Edward Dunlap
Senior Engineer-
Environmental

Attachment

AR301770



November 5, 1991

Mr. Ed Dunlap
Chesapeake Utilities
Post Office 615
Dover, Delaware 19903

Subject: Dover RI/FS
Response to EPA and DNREC Comments
Versar Project No. 6527

Dear Mr. Dunlap:

The purpose of this letter is to provide input for your response to the Delaware Department of Natural Resources and Environmental Control (DNREC) letter to you dated October 22, 1991, and the U.S. Environmental Protection Agency letter to DNREC dated October 1, 1991.

RESPONSE TO DNREC LETTER

GPR Survey Report and Remedial Investigation Objectives

Mr. Johnson is correct regarding the importance of quantifying the source materials before determining the feasibility of remedial alternatives. Quantification, however, will result from review of all data collected during the Remedial Investigation (RI), not from any single RI activity. Additionally, there appears to be some misunderstanding regarding the purpose, capabilities, and limitations of the GPR survey equipment and procedures. In conjunction with the electro-magnetometry (EM) survey, the GPR is only capable of identifying anomalies in density and conductivity of subsurface materials. Neither the GPR nor the EM by themselves are capable of identifying exact chemical nature and volume of the materials or constituents of the anomalies. Therefore, the purpose of the GPR and EM surveys was to identify the existence of anomalies which might indicate either subsurface cultural resources or other materials with densities or conductivities different from normal soil (see Work Plan, page 114). Results of the GPR and EM surveys were compared with the historical map and aerial photography research and with information obtained from interviews. Based on these results, it was possible to identify those areas where on-site soil borings should and should not be placed. With this in mind, the GPR and EM surveys successfully accomplished their intended purpose.

Source materials will be quantified during preparation of the final RI and FS reports using all data collected during the RI, including results of the GPR and EM surveys, on-site soil borings, on-site well logs, pathway analysis boring logs, and any excavation accomplished during the Phase Ib/II archaeology investigations.

Remedial Investigation Schedule

Revisions to the schedule for the pump test on Well 15 and for delivery of the Air Quality Report were inadvertently omitted when Revision 1a of the schedule was produced. The pump test will be conducted during the week of November 11, 1991. The final Air Quality

Report is expected to be delivered to DNREC and EPA in November 1991. Another revision to the schedule can be made if desired.

Pathway Analysis

Significant issues related to the October 25, 1991 DNREC written comments to the Pathway Analysis Report require discussion either before or during the meeting with DNREC and EPA scheduled for November 12, 1991. Therefore, response to these comments will be deferred for discussion at that time.

Work Plan Revisions

Versar is committed to delivering the final Phase I Ground-water Evaluation Study to DNREC and EPA not later than November 8, 1991.

Background Sources Inventory

Versar will comply with whatever direction is provided by Chesapeake Utilities Corporation regarding distribution of background sources inventory information.

RESPONSE TO EPA LETTERComment 1.

Please refer to the previous response regarding GPR and EM.

Comments 2 through 7.


Clarification and corrections requested will be provided. A schedule for delivery of this information will be available following a meeting scheduled with Engineering-Science on November 4, 1991.

Comment 8.

Please refer to the previous response regarding GPR and EM.

If you have any questions or need additional information, please call me at (703) 642-6921.

Sincerely,



David C. Durant
Project Manager

DCD/srs

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cc: Nancy Berenson, Morgan, Lewis, & Bockius

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